



October 11, 2012
Ms. Paula Wilson
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

paula.wilson@deq.idaho.gov

RE: Comments on FCR Rulemaking

Dear Ms. Wilson:

Northwest Food Processors Association (NWFPA) is a trade association representing the food processing industry in Oregon, Washington, and Idaho and over 400 companies in the food processing supply chain. Northwest Food Processors appreciates the process that the Idaho Department of Environmental Quality has started in regards to the revision to review the fish consumption rate in Idaho's Water Quality Standard. NWFPA submits the following comments:

NWFPA supports the Idaho Department of Environmental Quality to adopt a path to conduct an Idaho specific fish consumption study that represents the broad consumption of Idaho residents who fish Idaho waters and not limited to certain sub-populations. We urge the department to support well-designed scientific studies that prevent biasness and variability to occur.

The design needs to at a minimum include fish species and if they are solely fresh-water or anadromous, acquirement methods (store, fishing, etc.), caught location, preparation method, part(s) consumed, information that can be used to determine long term consumption behavior patterns, high consumption population identification and location, development of general population as well as high fish-consuming populations.

Before initiating the fish consumption study, further discussion of the rulemaking is needed around potential risks to general and subpopulations, how life history of anadromous fish will be incorporated in relationship to freshwater fish when setting rates, acceptable level of risk and exposure factors used to derive human health standards to create protective and reasonable standards.

As discovered during the Oregon and Washington process, concurrent development of implementation tools and human health water quality criteria revision is an important part of the rulemaking.

We appreciate the opportunity to participate in this important process,

Sincerely,

A handwritten signature in blue ink, appearing to read 'David McGiverin', is written over a light blue circular scribble.

David McGiverin
Environmental, Sustainability & Productivity Manager
Northwest Food Processors Association

cc: NWFPA Environmental Committee X